

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

ALEXANDRA GUILLOU,

Plaintiff,

v.

BOARD OF REGENTS FOR THE  
OKLAHOMA AGRICULTURAL AND  
MECHANICAL COLLEGES;  
STATE OF OKLAHOMA ex rel.  
OKLAHOMA STATE UNIVERSITY;  
ST. MATTHEWS UNIVERSITY;  
LUCINDA KERSHAW;  
DR. DANIEL BURBA;  
DR. CHRIS ROSS; and  
DR. JILLIAN GILMOUR;

Defendants.

Civil Action No.: CIV-17-988-HE

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS**

COMES NOW Plaintiff, Alexandra Guillou, by and through her undersigned counsel, and hereby files this Unopposed Motion for Extension of Time to file her Responses to Defendants Lucinda Kershaw, Dr. Daniel Burba, Dr. Chris Ross and Dr. Margi Gilmour (the "Individual Defendants") Motion to Dismiss Combined with Brief in Support of Motion [Docket No. 31], Defendants, the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges and the State of Oklahoma ex rel. Oklahoma State University Motions to Dismiss [Docket Nos. 32 and 33], and Defendant St. Matthew's University, Inc.'s Motion to Dismiss and Brief in Support [Docket No. 34] (herein the "Defendants' Motions") and would show the Court as follows:

1. Plaintiff filed her Complaint on September 13, 2017 [Docket No. 1].

2. On October 30, 2017, Defendant St. Matthew's University, Inc. filed its Unopposed Motion for Extension of Time to Answer or Otherwise Respond [Docket No. 22].

3. On October 31, 2017, the Court issued an Order Granting Defendant St. Matthew's University, Inc. Motion for Extension of Time to Answer or Otherwise Respond up to and including December 4, 2017 [Docket No. 23].

4. On December 4, 2017, Defendants Lucinda Kershaw, Dr. Daniel Burba, Dr. Chris Ross and Dr. Margi Gilmour (the "Individual Defendants"), filed their Motion to Dismiss Combined with Brief in Support of Motion [Docket No. 31].

5. On December 4, 2017, Defendants, the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges and the State of Oklahoma ex rel. Oklahoma State University filed their Motions to Dismiss [Docket Nos. 32 and 33].

6. On December 4, 2017, Defendant St. Matthew's University, Inc.'s filed its Motion to Dismiss and Brief in Support [Docket No. 34].

7. Without the extension requested herein and pursuant to LCvR7.1(g), Plaintiff's responses to the four Motions to Dismiss filed by the Defendants are due by December 26, 2017.

8. This is Plaintiff's first request for an extension of time to respond to Defendants' Motions to Dismiss.

9. Due to an out of state evidentiary hearing, pre-paid family vacation and the upcoming holidays, Plaintiff's counsel respectfully request a two (2) week extension, or until January 9, 2018, to file Plaintiff's responses to Defendants' Motions to Dismiss.

10. Counsel for all parties have conferred and agreed upon a two (2) week extension, or until January 9, 2018, as the date for Plaintiff to file her responses to Defendants' Motions to Dismiss.

11. This requested extension will have no effect on the Court's current schedule or deadlines.

WHEREFORE, Plaintiff respectfully requests that this Court grant this motion and allow Plaintiff up to and including January 9, 2018, to file her responses to Defendants' Motions to Dismiss, along with any other relief this Court deems just and proper.

Respectfully submitted,

**THE BACH LAW FIRM, LLC**

/s/ Jason J. Bach

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2017, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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*/s/ Jason J. Bach*  
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